

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ALTA POWER LLC,
Plaintiff/Counter-Defendant,

v.

**GENERAL ELECTRIC INTERNATIONAL,
INC., n/k/a GE VERNOVA
INTERNATIONAL LLC, d/b/a GE POWER
SERVICES,**
Defendant/Counter-Plaintiff.

Case No. 3:23-CV-270-X

NOTICE OF STIPULATION TO EXTEND EXPERT DISCOVERY DEADLINES

Counsel for GE Vernova International LLC and Alta Power LLC have conferred about this case's schedule and the deadlines for both the disclosure of expert witnesses and third-party depositions. Pursuant to the Amended Scheduling Order, Dkt. 73, the parties hereby notify the Court that they have agreed to modify the expert deadlines as follows:

1. The deadline for the party with the burden of proof on a claim to file a designation of expert witnesses and comply with Fed. R. Civ. P. 26(a)(2) is extended to February 25, 2025.
2. The deadline for rebuttal designation of expert witnesses and compliance with Fed. R. Civ. P. 26(a)(2) is extended to March 25, 2025.

In addition, the parties have agreed to conduct certain third-party depositions and expert depositions after the February 24, 2025 discovery deadline, but before the deadline to file motions for summary judgment.¹

This stipulation is made in accordance with the Amended Scheduling Order, which provides that the “parties generally may agree to extend this discovery deadline, provided that the extension does not affect any subsequent deadlines and the parties notify the Court in writing.” Dkt. 73 n.2. The extension of these deadlines for the disclosure of expert witnesses will not affect any subsequent deadlines in this case, including those for mediation, filing motions for summary judgment, motions to strike or exclude expert witnesses, or the trial date.

¹ Additionally, the parties have agreed that if they will call a witness that they control as part of their affirmative case at trial, they will make that witness available for a deposition, even if outside the discovery time period, and neither party will object to a subpoena for such a witness for a deposition based on timeliness grounds or because it is issued outside the close of discovery.

DATED: January 30, 2025

Respectfully submitted,

/s/ Michael Cancienne

JORDAN, LYNCH & CANCIENNE PLLC

Michael Cancienne

State Bar No. 24055256

Joseph W. (“Jeb”) Golinkin II

State Bar No. 24087596

1980 Post Oak Blvd., Ste. 2300

Houston, Texas 77056

713.955.4028

713.955.9644 Facsimile

mcancienne@jlcfirm.com

jgolinkin@jlcfirm.com

BAKER BOTTS L.L.P.

John B. Lawrence

Texas Bar No. 24055825

2001 Ross Avenue, Suite 900

Dallas, TX 75201-2980

Telephone: 214.953.6500

Facsimile: 214.953.6503

john.lawrence@bakerbotts.com

Attorneys for Alta Power LLC

/s/ Andrew LeGrand

John T. Cox III (Tex. Bar No. 24003722)

Andrew LeGrand (Tex. Bar No. 24070132)

Matthew Capoccia (Tex. Bar No. 24121526)

GIBSON, DUNN & CRUTCHER LLP

2001 Ross Avenue, Suite 2100

Dallas, TX 75201

Tel: 214.698.3100

TCox@gibsondunn.com

ALeGrand@gibsondunn.com

MCapoccia@gibsondunn.com

*Attorneys for General Electric International,
Inc., n/k/a GE Vernova International LLC,
d/b/a GE Power Services*

CERTIFICATE OF SERVICE

I certify that on January 30, 2025, a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand

Andrew LeGrand

*Attorney for General Electric International, Inc.,
n/k/a GE Vernova International LLC, d/b/a GE
Power Services*

CERTIFICATE OF CONFERENCE

We certify that counsel for GE Vernova International LLC and counsel for Alta Power LLC conferred on January 28, 2025, and agreed to extend the deadlines for the disclosures of expert witnesses as set forth in this Notice.

/s/ Michael Cancienne
Michael Cancienne

Attorney for Alta Power LLC

/s/ Andrew LeGrand
Andrew LeGrand

*Attorney for General Electric
International, Inc., n/k/a GE Vernova
International LLC, d/b/a GE Power
Services*